

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JAMES BRUNETTE; STUART	:	
BULLARD; SENAD DEDOVIC; WILLY	:	
GARCIA DOMINGUEZ; SCOTT DYER;	:	
LEONARDO GONZELEZ; BENJAMIN	:	CIVIL ACTION
HARDING; KEVIN HOWES; WILLIAM	:	
HOWES; ROBERT MOORE; EDWARD	:	NO. _____
NEE; JAY PRYOR; JUAN ROLDAN;	:	
ALAN SANTOS; GLENN TAYLOR;	:	JURY TRIAL DEMANDED
LAWRENCE TAYLOR; AARON TRIAL;	:	
and JEFFREY WOSENCREFT,	:	
Plaintiffs,	:	
v.	:	
	:	
BIMBO BAKERIES USA, INC. and BIMBO	:	
FOODS BAKERIES DISTRIBUTION, LLC,	:	
	:	
Defendants.	:	

COMPLAINT

Plaintiffs were recently dismissed from a Fair Labor Standards Act (“FLSA”) collective action styled *Camp v. Bimbo Bakeries USA, Inc.*, 1:18-cv-00378, after the New Hampshire District Court determined that *Bristol-Myers Squibb Co. v. Superior Court of California*, __ U.S. __, 137 S. Ct. 1773, 198 L. Ed. 395 (2017), prevented it from exercising personal jurisdiction over Defendants with respect to the FLSA claims of individuals who did not work in New Hampshire. *See Camp*, 2020 U.S. Dist. LEXIS 60997 (D.N.H. Apr. 7, 2020).¹ In the wake of this ruling, Plaintiffs bring their FLSA claims to this judicial district (wherein Defendants are headquartered) and allege the following:

¹ The “Opt-In Consent Forms” that each Plaintiff filed with the *Camp* Court are attached as Exhibit A.

PARTIES

1. Plaintiffs worked for Defendants (as defined in paragraph 4) as “distributors” assigned to “depots” located outside of New Hampshire. Specifically:

- a. James Brunette resides in Manchester, NH and was assigned to a depot in MA;
- b. Stuart Bullard resides in Bangor, ME and was assigned to a depot in ME;
- c. Senad Dedovic resides in Woodbury, CT and was assigned to depots in CT;
- d. Willy Garcia Dominguez resides in Johnston, RI and was assigned to a depot in MA;
- e. Scott Dyer resides in Braintree, MA and was assigned to a depot in MA;
- f. Leonardo Gonzelez resides in Lawrence, MA and was assigned to a depot in MA;
- g. Benjamin Harding resides in Souderstown, RI and is assigned to a depot in MA;
- h. Kevin Howes resides in Gorham, ME and was assigned to a depot in ME;
- i. William Howes resides in Buxton, ME and is assigned to a depot in ME;
- j. Robert Moore resides in Springfield, MA and was assigned to a depot in MA;
- k. Edward Nee resides in Charleston, ME and is assigned to a depot in ME;
- l. Jay Pryor resides in Bristol, CT and was assigned to a depot in CT;
- m. Juan Roldan resides in Brockton, MA and was assigned to a depot in MA;
- n. Alan Santos resides in Middleboro, MA and is assigned to a depot in MA;
- o. Glenn Taylor resides in Whitefield, ME and is assigned to a depot in ME;
- p. Lawrence Taylor resides in Cranston, RI and was assigned to a depot in MA;
- q. Aaron Trial resides in Smithfield, ME and is assigned to a depot in ME;

r. Jeffrey Wosencroft resides in Wakefield, RI and is assigned to a depot in MA.

2. Bimbo Bakeries USA, Inc. is a corporate entity headquartered in Horsham, PA.

3. Bimbo Foods Bakeries, LLC is corporate entity headquartered in Horsham, PA.

4. We refer to Bimbo Bakeries USA, Inc. and Bimbo Foods Bakeries, LLC collectively as “Defendants.”

5. Defendants employ individuals engaged in commerce or in the production of goods for commerce and/or handling, selling, or otherwise working on goods or materials that have been moved in or produced in commerce by any person.

JURISDICTION AND VENUE

6. Subject matter jurisdiction is proper under 29 U.S.C. § 216(b) and 28 U.S.C. §§ 1331.

7. Venue is proper under 28 U.S.C. § 1391.

FACTS

8. Defendants “are in the business of manufacturing, selling, and delivering baked goods under brand names that include Sara Lee and Nature’s Harvest.” *Camp*, 2020 U.S. Dist. LEXIS 60997, at *3.

9. Plaintiffs “are ‘distributors’ who deliver Bimbo Bakeries products to stock shelves in various stores.” *Camp*, 2020 U.S. Dist. LEXIS 60997, at *3.

10. The distributor job does not require any special skills and can be quickly and easily learned through on-the-job training.

11. The services performed by Plaintiffs and other distributors are integral to Defendants’ business. Indeed, Bimbo USA’s website asserts that the company “operates more than 60 bakeries, employs more than 20,000 associates and *distributes products through 11,000 sales routes throughout the United States.*” See <https://bimbobakeriesusa.com/about-us#fact->

[sheet](#) (emphasis supplied)

12. Plaintiffs, like other distributors, generally worked for Defendants on a long-term basis. Specifically, Plaintiffs' average tenure exceeds 5 years.

13. Defendants exert substantial control over the most basic aspects of Plaintiffs' work. For example, Defendants: unilaterally determine food item prices; unilaterally negotiate with customers concerning product prices, promotional programs, and other merchandising issues; require Plaintiffs to stock store shelves pursuant to detailed "planograms" and other directives; unilaterally adjust food item orders; dictate the circumstances under which food items must be removed from customers as "stale;" require Plaintiffs to deliver food products to unprofitable accounts; require Plaintiffs to participate in marketing programs determined solely by Defendants; require Plaintiffs to utilize inventory control and record-keeping systems developed exclusively by Defendants; and generally prohibit Plaintiffs from delivering competitors' food products.

14. Plaintiffs regularly work over 40 hours per week and, in fact, it is not unusual for some Plaintiffs to work over 60 hours during busy weeks.

15. Defendants do not pay Plaintiffs any overtime premium compensation for hours worked over 40 per week.

COUNT I

16. The FLSA requires that employees receive overtime premium compensation calculated at 150% of their regular pay rate for all hours worked over 40 per week. *See* 29 U.S.C. § 207(a)(1).

17. Defendants are employers required to comply with the FLSA's overtime pay mandate, and Plaintiffs are employees entitled to the mandate's protections.

18. Defendants violated the FLSA by failing to pay Plaintiffs overtime premium compensation for hours worked over 40 per week.

19. In violating the FLSA, Defendants acted willfully and with reckless disregard of clearly applicable FLSA provisions.

JURY DEMAND

Plaintiffs demand a jury trial.

PRAYER FOR RELIEF

Plaintiffs seek:

- A. Unpaid overtime wages and prejudgment interest;
- B. Liquidated damages;
- C. Litigation costs, expenses, and attorneys' fees; and
- D. Any other relief as the Court deems just and proper.

Date: May 12, 2020

Respectfully,



Peter Winebrake
R. Andrew Santillo
Mark J. Gottesfeld
Winebrake & Santillo, LLC
715 Twining Road, Suite 211
Dresher, PA 19025
(215) 884-2491

Harold L. Lichten (*pro hac vice* admission anticipated)
Matthew Thomson (*pro hac vice* admission anticipated)
Zachary L. Rubin (*pro hac vice* admission anticipated)
Lichten & Liss-Riordan, P.C.
729 Boylston Street, Suite 2000
Boston, MA 02116
(617) 994-5800

Exhibit A

OPT-IN CONSENT FORM

United States District Court for the District of New Hampshire
Camp et al., v. Bimbo Bakeries USA, Inc., et al.
CASE NO. 18-CV-00378

Complete and return by mail, fax, or email to:

Lichten & Liss-Riordan, P.C.
729 Boylston St., Suite 2000
Boston, MA 02116
Tel: (617) 994-5800
Fax: (617) 994-5801
kmccarty@llrlaw.com (Kelsey McCarty, paralegal)

Name: James C. Brunette Sr.

City Manchester State NH Zip 03102

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b)

1. I consent and agree to pursue my federal wage claims arising out of the work I performed for Bimbo Bakeries.

2. I worked for Bimbo Foods at Wilmington, MA (locations)
from 08/2015 (date) to 12/2016 (date).

3. During that time, I worked more than forty hours per week and did not receive proper overtime pay, calculated as one-and-one-half times my regular rate.

4. I understand that I will be joining a lawsuit to bring a claim under the Fair Labor Standards Act, 29 U.S.C. § 201, et seq. I hereby consent, agree, and "opt in" to become a plaintiff herein and to be bound by any judgment by the court or any settlement of this action. I hereby designate Lichten & Liss-Riordan, P.C. and Coughlin Law Group, P.C. to represent me for all purposes in this action.

Signature: James C. Brunette Sr.

Date: 7/31/19

OPT-IN CONSENT FORM

United States District Court for the District of New Hampshire
Camp et al., v. Bimbo Bakeries USA, Inc., et al.
CASE NO. 18-CV-00378

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729 Boylston St., Suite 2000
Boston, MA 02116
Tel: (617) 994-5800
Fax: (617) 994-5801
kmccarty@llrlaw.com (Kelsey McCarty, paralegal)

Name: STUART A. BULLARD

City Bangor State ME Zip 04401

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b)

1. I consent and agree to pursue my federal wage claims arising out of the work I performed for Bimbo Bakeries.

2. I worked for Bimbo Foods at Bangor, Me (locations)
from 11/19/2012 (date) to 10/22/2017 (date).

3. During that time, I worked more than forty hours per week and did not receive proper overtime pay, calculated as one-and-one-half times my regular rate.

4. I understand that I will be joining a lawsuit to bring a claim under the Fair Labor Standards Act, 29 U.S.C. § 201, et seq. I hereby consent, agree, and "opt in" to become a plaintiff herein and to be bound by any judgment by the court or any settlement of this action. I hereby designate Lichten & Liss-Riordan, P.C. and Coughlin Law Group, P.C. to represent me for all purposes in this action.

Signature: Stuart A. Bullard

Date: 7/8/2019

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Boston, MA 02116
Tel: (617) 994-5800
Fax: (617) 994-5801
kmccarty@llrlaw.com (Kelsey McCarty, paralegal)

Name:

Senad Dedovic

City

Woodbury

State

CT

Zip

06798

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b)

1. I consent and agree to pursue my federal wage claims arising out of the work I performed for Bimbo Bakeries.
2. I worked for Bimbo Foods at waterbury/Naugatuck (locations)
from 2014 (date) to 2017 (date).
3. During that time, I worked more than forty hours per week and did not receive proper overtime pay, calculated as one-and-one-half times my regular rate.
4. I understand that I will be joining a lawsuit to bring a claim under the Fair Labor Standards Act, 29 U.S.C. § 201, et seq. I hereby consent, agree, and "opt in" to become a plaintiff herein and to be bound by any judgment by the court or any settlement of this action. I hereby designate Lichten & Liss-Riordan, P.C. and Coughlin Law Group, P.C. to represent me for all purposes in this action.

Signature:

Senad Dedovic

Date:

6-2-19

OPT-IN CONSENT FORM

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CASE NO. 18-CV-00378

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Boston, MA 02116
Tel: (617) 994-5800
Fax: (617) 994-5801
kmccarty@llrlaw.com (Kelsey McCarty, paralegal)

Scott G. Dyer

Name:

[Redacted Name]

Braintree

City

MA

State

02184

Zip

[Redacted Address]

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b)

1. I consent and agree to pursue my federal wage claims arising out of the work I performed for Bimbo Bakeries.

2. I worked for Bimbo Foods at Middleboro, ma (locations)
from sept. 2012 (date) to Present (date).

3. During that time, I worked more than forty hours per week and did not receive proper overtime pay, calculated as one-and-one-half times my regular rate.

4. I understand that I will be joining a lawsuit to bring a claim under the Fair Labor Standards Act, 29 U.S.C. § 201, et seq. I hereby consent, agree, and "opt in" to become a plaintiff herein and to be bound by any judgment by the court or any settlement of this action. I hereby designate Lichten & Liss-Riordan, P.C. and Coughlin Law Group, P.C. to represent me for all purposes in this action.

Signature: Scott Dyer

Date: 08/20/2019

OPT-IN CONSENT FORM

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CASE NO. 18-CV-00378

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729 Boylston St., Suite 2000
Boston, MA 02116
Tel: (617) 994-5800
Fax: (617) 994-5801
kmccarty@llrlaw.com (Kelsey McCarty, paralegal)

Name: Willy Garcia Dominguez

City Johnston

State RI

Zip 02918

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b)

1. I consent and agree to pursue my federal wage claims arising out of the work I performed for Bimbo Bakeries.

2. I worked for Bimbo Foods at Rehoboth M.A. (locations)
from 7/23/2013 (date) to 7/23/2019 (date).

3. During that time, I worked more than forty hours per week and did not receive proper overtime pay, calculated as one-and-one-half times my regular rate.

4. I understand that I will be joining a lawsuit to bring a claim under the Fair Labor Standards Act, 29 U.S.C. § 201, et seq. I hereby consent, agree, and "opt in" to become a plaintiff herein and to be bound by any judgment by the court or any settlement of this action. I hereby designate Lichten & Liss-Riordan, P.C. and Coughlin Law Group, P.C. to represent me for all purposes in this action.

Signature: [Signature]

Date: 7/23/2019

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Boston, MA 02116
Tel: (617) 994-5800
Fax: (617) 994-5801
kmccarty@llrlaw.com (Kelsey McCarty, paralegal)

Name: LEONARDO A GONZALEZ

[REDACTED]

City LAWRENCE State MA Zip 01841

[REDACTED]

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b)

1. I consent and agree to pursue my federal wage claims arising out of the work I performed for Bimbo Bakeries.

2. I worked for Bimbo Foods at WILMINGTON MA (locations)
from 10-2013 (date) to 3-28-18 (date).

3. During that time, I worked more than forty hours per week and did not receive proper overtime pay, calculated as one-and-one-half times my regular rate.

4. I understand that I will be joining a lawsuit to bring a claim under the Fair Labor Standards Act, 29 U.S.C. § 201, et seq. I hereby consent, agree, and "opt in" to become a plaintiff herein and to be bound by any judgment by the court or any settlement of this action. I hereby designate Lichten & Liss-Riordan, P.C. and Coughlin Law Group, P.C. to represent me for all purposes in this action.

Signature: Leonardo Gonzalez Date: 6-2-19

OPT-IN CONSENT FORM

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Boston, MA 02116
Tel: (617) 994-5800
Fax: (617) 994-5801
kmccarty@llrlaw.com (Kelsey McCarty, paralegal)

Name: Benjamin E. MacLino

City Sunderland

State RI

Zip 02874

CONSENT TO JOIN COLLECTIVE ACTION


Pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b)

1. I consent and agree to pursue my federal wage claims arising out of the work I performed for Bimbo Bakeries.

2. I worked for Bimbo Foods at Rehoboth, MA (locations)
from June 08 2013 (date) to Current still working (date).

3. During that time, I worked more than forty hours per week and did not receive proper overtime pay, calculated as one-and-one-half times my regular rate.

4. I understand that I will be joining a lawsuit to bring a claim under the Fair Labor Standards Act, 29 U.S.C. § 201, et seq. I hereby consent, agree, and "opt in" to become a plaintiff herein and to be bound by any judgment by the court or any settlement of this action. I hereby designate Lichten & Liss-Riordan, P.C. and Coughlin Law Group, P.C. to represent me for all purposes in this action.

Signature: 

Date: 8/24/19

OPT-IN CONSENT FORM

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CASE NO. 18-CV-00378

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729 Boylston St., Suite 2000
Boston, MA 02116
Tel: (617) 994-5800
Fax: (617) 994-5801
kmccarty@llrlaw.com (Kelsey McCarty, paralegal)

Name: _____

William Howes

City _____

Buxton

State _____

ME

Zip _____

04093

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b)

1. I consent and agree to pursue my federal wage claims arising out of the work I performed for Bimbo Bakeries.

2. I worked for Bimbo Foods at Scarborough (locations)
from 6/2003 (date) to Present (date).

3. During that time, I worked more than forty hours per week and did not receive proper overtime pay, calculated as one-and-one-half times my regular rate.

4. I understand that I will be joining a lawsuit to bring a claim under the Fair Labor Standards Act, 29 U.S.C. § 201, et seq. I hereby consent, agree, and "opt in" to become a plaintiff herein and to be bound by any judgment by the court or any settlement of this action. I hereby designate Lichten & Liss-Riordan, P.C. and Coughlin Law Group, P.C. to represent me for all purposes in this action.

Signature: _____

William Howes

Date: _____

8/1/2019

OPT-IN CONSENT FORM

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Boston, MA 02116
Tel: (617) 994-5800
Fax: (617) 994-5801
kmccarty@llrlaw.com (Kelsey McCarty, paralegal)

Name:

Robert Moore

City

Springfield

State

MA

Zip

01109

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b)

1. I consent and agree to pursue my federal wage claims arising out of the work I performed for Bimbo Bakeries.

2. I worked for Bimbo Foods at millbury MA (locations)
from 9-1-14 (date) to 10-11-15 (date).

3. During that time, I worked more than forty hours per week and did not receive proper overtime pay, calculated as one-and-one-half times my regular rate.

4. I understand that I will be joining a lawsuit to bring a claim under the Fair Labor Standards Act, 29 U.S.C. § 201, et seq. I hereby consent, agree, and "opt in" to become a plaintiff herein and to be bound by any judgment by the court or any settlement of this action. I hereby designate Lichten & Liss-Riordan, P.C. and Coughlin Law Group, P.C. to represent me for all purposes in this action.

Signature:

Robert H Moore

Date:

8-21-19

OPT-IN CONSENT FORM

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Tel: (617) 994-5800
Fax: (617) 994-5801
kmccarty@llrlaw.com (Kelsey McCarty, paralegal)

Name:

Edward Nee

City

Charleston

State

me

Zip

044 22

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b)

1. I consent and agree to pursue my federal wage claims arising out of the work I performed for Bimbo Bakeries.

2. I worked for Bimbo Foods at Bangor, Maine (locations)
from 10/09 (date) to Present (date).

3. During that time, I worked more than forty hours per week and did not receive proper overtime pay, calculated as one-and-one-half times my regular rate.

4. I understand that I will be joining a lawsuit to bring a claim under the Fair Labor Standards Act, 29 U.S.C. § 201, et seq. I hereby consent, agree, and "opt in" to become a plaintiff herein and to be bound by any judgment by the court or any settlement of this action. I hereby designate Lichten & Liss-Riordan, P.C. and Coughlin Law Group, P.C. to represent me for all purposes in this action.

Signature:

Edward Nee

Date:

7/20/19

OPT-IN CONSENT FORM

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Boston, MA 02116
Tel: (617) 994-5800
Fax: (617) 994-5801
kmccarty@llrlaw.com (Kelsey McCarty, paralegal)

Name: Jay Pryor

City Bristol

State CT

Zip 06010

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b)

1. I consent and agree to pursue my federal wage claims arising out of the work I performed for Bimbo Bakeries.

2. I worked for Bimbo Foods at Crowell, CT. (locations)
from 11/2012 (date) to 7/2015 (date).

3. During that time, I worked more than forty hours per week and did not receive proper overtime pay, calculated as one-and-one-half times my regular rate.

4. I understand that I will be joining a lawsuit to bring a claim under the Fair Labor Standards Act, 29 U.S.C. § 201, et seq. I hereby consent, agree, and "opt in" to become a plaintiff herein and to be bound by any judgment by the court or any settlement of this action. I hereby designate Lichten & Liss-Riordan, P.C. and Coughlin Law Group, P.C. to represent me for all purposes in this action.

Signature: Jay Pryor

Date: 6-2-2019

OPT-IN CONSENT FORM

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Tel: (617) 994-5800
Fax: (617) 994-5801
kmccarty@llrlaw.com (Kelsey McCarty, paralegal)

Name:

JUAN C. ROLDAN

City

BROCKTON

State

MA

Zip

02305

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b)

1. I consent and agree to pursue my federal wage claims arising out of the work I performed for Bimbo Bakeries.

2. I worked for Bimbo Foods at WILMINGTON (locations)
from 2011 (date) to 2015 (date).

3. During that time, I worked more than forty hours per week and did not receive proper overtime pay, calculated as one-and-one-half times my regular rate.

4. I understand that I will be joining a lawsuit to bring a claim under the Fair Labor Standards Act, 29 U.S.C. § 201, et seq. I hereby consent, agree, and "opt in" to become a plaintiff herein and to be bound by any judgment by the court or any settlement of this action. I hereby designate Lichten & Liss-Riordan, P.C. and Coughlin Law Group, P.C. to represent me for all purposes in this action.

Signature:

JUAN C ROLDAN

Date:

6-8-19

OPT-IN CONSENT FORM

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Boston, MA 02116
Tel: (617) 994-5800
Fax: (617) 994-5801
kmccarty@llrlaw.com (Kelsey McCarty, paralegal)

Name: ALAN SANTOS

City Middleboro State MA Zip 02346

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b)

1. I consent and agree to pursue my federal wage claims arising out of the work I performed for Bimbo Bakeries.

2. I worked for Bimbo Foods at Middleboro MA 02346 (locations)
from Oct 13 2013 (date) to present 2019 (date).

3. During that time, I worked more than forty hours per week and did not receive proper overtime pay, calculated as one-and-one-half times my regular rate.

4. I understand that I will be joining a lawsuit to bring a claim under the Fair Labor Standards Act, 29 U.S.C. § 201, et seq. I hereby consent, agree, and "opt in" to become a plaintiff herein and to be bound by any judgment by the court or any settlement of this action. I hereby designate Lichten & Liss-Riordan, P.C. and Coughlin Law Group, P.C. to represent me for all purposes in this action.

Signature: Alan Santos Date: 8-21-19

OPT-IN CONSENT FORM

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Boston, MA 02116
Tel: (617) 994-5800
Fax: (617) 994-5801
kmccarty@llrlaw.com (Kelsey McCarty, paralegal)

Name: GLENN TAYLOR

City WHITEFIELD State ME Zip 04353

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b)

1. I consent and agree to pursue my federal wage claims arising out of the work I performed for Bimbo Bakeries.

2. I worked for Bimbo Foods at FAIRFIELD, MAINE (locations)
from JULY 18, 2011 (date) to AUGUST 26, 2017 (date).

3. During that time, I worked more than forty hours per week and did not receive proper overtime pay, calculated as one-and-one-half times my regular rate.

4. I understand that I will be joining a lawsuit to bring a claim under the Fair Labor Standards Act, 29 U.S.C. § 201, et seq. I hereby consent, agree, and "opt in" to become a plaintiff herein and to be bound by any judgment by the court or any settlement of this action. I hereby designate Lichten & Liss-Riordan, P.C. and Coughlin Law Group, P.C. to represent me for all purposes in this action.

Signature: [Signature]

Date: 6/3/2019

OPT-IN CONSENT FORM

United States District Court for the District of New Hampshire
Camp et al., v. Bimbo Bakeries USA, Inc., et al.
CASE NO. 18-CV-00378

Complete and return by mail, fax, or email to:

Lichten & Liss-Riordan, P.C.
729 Boylston St., Suite 2000
Boston, MA 02116
Tel: (617) 994-5800
Fax: (617) 994-5801
kmccarty@ilrlaw.com (Kelsey McCarty, paralegal)

Name: Lawrence Taylor

City Cranston State R.I. Zip 02920

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b)

1. I consent and agree to pursue my federal wage claims arising out of the work I performed for Bimbo Bakeries.

2. I worked for Bimbo Foods at Rehoboth Massachusetts (locations)
from 11/2013 (date) to 8/30/2019 (date).

3. During that time, I worked more than forty hours per week and did not receive proper overtime pay, calculated as one-and-one-half times my regular rate.

4. I understand that I will be joining a lawsuit to bring a claim under the Fair Labor Standards Act, 29 U.S.C. § 201, et seq. I hereby consent, agree, and "opt in" to become a plaintiff herein and to be bound by any judgment by the court or any settlement of this action. I hereby designate Lichten & Liss-Riordan, P.C. and Coughlin Law Group, P.C. to represent me for all purposes in this action.

Signature: Lawrence Taylor Date: 8/13/19

OPT-IN CONSENT FORM

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Tel: (617) 994-5800
Fax: (617) 994-5801
kmccarty@llrlaw.com (Kelsey McCarty, paralegal)

Name: Aaron Jason Tripp

City Smithfield State Me Zip 04978

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b)

1. I consent and agree to pursue my federal wage claims arising out of the work I performed for Bimbo Bakeries.

2. I worked for Bimbo Foods at Fairfield ME (locations)
from Feb 2010 (date) to Nov 2017 (date).

3. During that time, I worked more than forty hours per week and did not receive proper overtime pay, calculated as one-and-one-half times my regular rate.

4. I understand that I will be joining a lawsuit to bring a claim under the Fair Labor Standards Act, 29 U.S.C. § 201, et seq. I hereby consent, agree, and "opt in" to become a plaintiff herein and to be bound by any judgment by the court or any settlement of this action. I hereby designate Lichten & Liss-Riordan, P.C. and Coughlin Law Group, P.C. to represent me for all purposes in this action.

Signature: [Signature]

Date: 7/22/19

OPT-IN CONSENT FORM

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Tel: (617) 994-5800
Fax: (617) 994-5801
kmccarty@llrlaw.com (Kelsey McCarty, paralegal)

Name: JEFFREY Wosencroft

City WAKEFIELD State RI Zip 02879

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b)

1. I consent and agree to pursue my federal wage claims arising out of the work I performed for Bimbo Bakeries.

2. I worked for Bimbo Foods at 63 FALL RIVER AVE. Rehoboth MA. 02769 (locations)
from 12/14 (date) to 12/15 (date).

3. During that time, I worked more than forty hours per week and did not receive proper overtime pay, calculated as one-and-one-half times my regular rate.

4. I understand that I will be joining a lawsuit to bring a claim under the Fair Labor Standards Act, 29 U.S.C. § 201, et seq. I hereby consent, agree, and "opt in" to become a plaintiff herein and to be bound by any judgment by the court or any settlement of this action. I hereby designate Lichten & Liss-Riordan, P.C. and Coughlin Law Group, P.C. to represent me for all purposes in this action.

Signature: Jeffrey Wosencroft Date: 8/26/2019